

DEFENDANTS' PROPOSED VOIR DIRE

1. Are you personally acquainted with the Plaintiffs, the Defendants, the attorneys, the witnesses, or anyone else connected with this lawsuit?
2. What is your impression of Fair Isaac, if any?
3. What is your impression of Experian, if any?
4. What is your impression of Trans Union, if any?
5. What is your impression of VantageScore, if any?

6. Have you ever done business with the Plaintiffs or Defendants? If so, describe.
7. Do you presently hold any jobs outside the home?
8. What is your primary occupation/present employer, and job position?
9. What is the principal activity of your employer?
10. Do you hold any other jobs at present?

(If any panel member is retired, unemployed or homemaker, ask questions 11-13)

11. What was your last occupation?
12. Who was your last employer and when did you leave that employer?
13. What was your title or position?
14. What other occupations have you worked in?
15. What is your educational background?
16. In your work, do your responsibilities include dealing with credit reports, credit scores, or anything else relating to credit? If so, please describe those responsibilities.
17. Have you applied for credit or a loan in the last four years? If so, what type of credit or loan did you seek? (i.e., credit card, car loan, mortgage)
18. Have you had any negative experiences in applying for credit – whether for a mortgage, car loan, credit card, or other purchase or loan?
19. Have you ever had a credit line decreased or had your interest rates raised?
20. Have you had any negative experiences with credit you have obtained, such as defaulting on a loan or having a mortgage foreclosed on you or a family member?
21. Have you or a family member ever filed for bankruptcy?
22. Have you ever obtained your credit score? If so, from what companies have you obtained your credit score, if you know?

23. Have you ever obtained your credit report? If so, from what companies have you obtained your credit report, if you know?
24. If you obtained your credit report, did it contain any errors? If so, how did you address the error?
25. Have you ever been concerned about the accuracy of your credit score?
26. Have you ever been unsure about the meaning of your credit score? If so, what didn't you understand?
27. Have you ever been mistaken about what company provided your credit score? If so, please explain the mistake and what you did about it.
28. Have you been involved in any personal or business dispute regarding credit scores or credit reports? If so, how was the issue resolved? Were you satisfied with the resolution?
29. Do you have any experience in creating or conducting surveys?
30. Have you ever participated in a survey? What kind?
31. Do you think surveys are generally pretty reliable? Why or why not?
32. Do you have any education, training or experience in the field of statistical analysis?
33. Do any other adults live in your household? (if yes, what are their occupations?)
34. What are your major hobbies, interests or spare-time activities?
35. What social, community, charitable, civic or political organizations do you belong to?
36. Have you, any member of your family, or close friends ever been involved in a lawsuit? As a party or witness?
37. What was the suit about? How was it resolved?
38. Have you ever hired a lawyer? For what purpose?
39. Were you satisfied with the services you received?

40. Have you ever served as a juror?
41. Was it a criminal or civil case?
42. Were you the foreperson of a jury?
43. Is there anyone here who – even before the trial begins – cares who wins? In other words, does anyone think that they would begin this case leaning toward the side of the plaintiffs or defendants for any reason?
44. There are two sides to every story. Under our legal system, the plaintiff goes first and introduces all of his evidence, then the defendant introduces its evidence. Is there anyone here who would not be able to wait until all of the evidence is presented, from both the plaintiff and the defendant, before making up your minds?
45. Is there anything that you would like to tell the court that you feel is important for the court and the parties to be aware of?

Respectfully submitted this 21st day of September, 2009.

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